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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REQUEST FOR ENTRY OF ORDER BY
DEFAULT ON MOTION FOR ENTRY OF
AN ORDER FURTHER EXTENDING
DEADLINE FOR THE REORGANIZED
DEBTORS TO OBJECT TO CLAIMS AND
FOR RELATED RELIEF**

[Re: Docket No. 12229]

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RELIEF REQUESTED IN THE APPLICATION

The Motion seeks entry of an order (i) further extending the deadline established under the Plan for the Reorganized Debtors to object to Claims by an additional one hundred eighty (180) days, through and including December 19, 2022, without prejudice to the Reorganized Debtors' right to seek additional extensions thereof; and (ii) granting related relief. A proposed order (the "**Proposed Order**") was attached as Exhibit A to the Motion.

NOTICE AND SERVICE

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1 **DECLARATION OF NO OPPOSITION RECEIVED**

2 The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that:

3 1. I am an attorney with the firm of Keller Benvenuti Kim LLP, co-counsel for the
4 Reorganized Debtors.

5 2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that
6 no response or opposition has been filed with respect to the Motion.

7 3. This declaration was executed in Sunnyvale, California.

8 WHEREFORE, the Reorganized Debtors hereby request entry of the Proposed Order, granting
9 the Motion as set forth therein.

10
11 Dated: May 18, 2022

WEIL, GOTSHAL & MANGES LLP
KELLER BENVENUTTI KIM LLP

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13 /s/ Thomas B. Rupp
 Thomas B. Rupp

14 *Attorneys for Debtors and Reorganized Debtors*
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